

EXHIBIT “C”

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF)
CLIFF MANOR, INC., INTEGRATED)
HEALTH SERVICES AT RIVERBEND,)
INTEGRATED HEALTH SERVICES AT)
SOMERSET VALLEY, INC., ALPINE)
MANOR, INC., BRIARCLIFF NURSING)
HOME, INC., SPRING CREEK OF IHS, INC.,)
FIRELANDS OF IHS, INC., ELM CREEK OF)
IHS, INC., and IHS LONG TERM CARE)
SERVICES, INC.,)

Civil Action No. 04-910

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant,

V.

ABE BRIARWOOD CORPORATION and
JOHN DOES 1-10,

Additional Counterclaim
Defendants,

PLAINTIFFS' FIRST INTERROGATORIES;
PLAINTIFFS' FIRST DOCUMENT REQUEST

Defendant is required to answer under oath the following interrogatories (“Q ...”) within the time limit provided in the Federal Rules of Civil Procedure. Defendant is further required to produce documents in its possession, custody or control responsive to the following document requests (“R...”), at the offices of Troutman Sanders LLP, The Chrysler Building, 405 Lexington Avenue, New York, New York, at 10:00 a.m. on July 17, 2006.

Definitions and Instructions

- A. “Document” has the meaning ascribed to it by F.R.Civ.P. Rule 34(a).
- B. “Nine Tenants” means the first nine named plaintiffs herein, or any of them, whether as prepetition debtors, debtors-in-possession, or as reorganized debtors.
- C. A document is “created” at the time of the original document. It is not “created” when a previously transmitted document is copied.
- D.. A document was “exchanged between the parties” if it was sent by defendant to, or received by defendant from, (i) Integrated Health Services, Inc., debtor-in-possession, or any of its direct or indirect subsidiaries (including without limitation the Nine Tenants); (ii) the Creditors’ Committee of Integrated Health Services, Inc., debtor-in-possession; (iii) IHS Long Term Care Services, Inc., or (iv) Abe Briarwood Corporation. For the purposes of this definition, the named entities include their respective agents and attorneys, and “sent” includes transmission by any means.
- E. All time periods listed are inclusive of both the starting and ending dates.

Interrogatories and Document Requests

Q1. Were there any documents, created during the period February 2, 2000, to March 18, 2002, which referred to or mentioned any guaranty of the obligations of the Nine Tenants by Integrated Health Services, Inc., debtor (i.e., the prepetition entity), and which were exchanged between the parties during the aforesaid period of time?

A1.

R1. If A1 is affirmative, produce such documents.

Q2. Were there any documents, created during the period February 2, 2000, to March 18, 2002, which referred to or mentioned any guaranty of the obligations of the Nine

Tenants by Integrated Health Services, Inc., debtor (i.e., the prepetition entity), and which were exchanged between the parties during the period March 18, 2002, and April 22, 2003?

A2.

R2. If A2 is affirmative, produce such documents.

Q3. Were there any documents, created during the period February 2, 2000, to April 22, 2003, which referred to or mentioned any extant guaranty of the obligations of the Nine Tenants by Integrated Health Services, Inc., debtor-in-possession, and which were exchanged between the parties during the aforesaid period of time?

A3.

R3. If A3 is affirmative, produce such documents.

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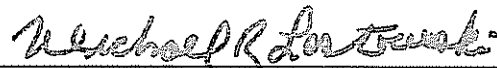
Q4. Were there any documents, created during the period February 2, 2000, to April 22, 2003, which proposed or suggested the creation of any guaranty of the obligations of the Nine Tenants by Integrated Health Services, Inc., debtor-in-possession, and which were exchanged between the parties during the aforesaid period of time?

A4.

R4. If A4 is affirmative, produce such documents.

DATED: June 15, 2006

DUANE MORRIS LLP



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-and-

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Counterclaim Defendant Abe Briarwood Corp. and
non-parties Leonard Grunstein and Rubin Schron*

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INTEGRATED HEALTH SERVICES OF)	
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INTEGRATED HEALTH SERVICES AT)	
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FIRELANDS OF IHS, INC., ELM CREEK OF)	
IHS, INC., and IHS LONG TERM CARE)	
SERVICES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
THCI COMPANY LLC,)	
)	
Defendant,)	
)	
v.)	
)	
ABE BRIARWOOD CORPORATION and)	
JOHN DOES 1-10,)	
)	
Additional Counterclaim)	
Defendants,)	
)	

NOTICE OF SERVICE OF DISCOVERY REQUESTS

Pursuant to Del. Dist. LR 5.4, I hereby certify that on June 15, 2006, **Plaintiffs' First Interrogatories and Plaintiffs' First Document Request** were served as indicated on the following:

David Sager, Esquire
Pitney Hardin LLP
P.O. Box 1945
Morristown, NJ 07962
Via Regular Mail

Collins J. Seitz, Jr., Esquire
Connolly Bove Lodge & Hutz LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19801
Via Hand-Delivery

Dated: June 15, 2006
Wilmington, Delaware

DUANE MORRIS LLP



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non-parties Leonard Grunstein and Rubin Schron*

Discovery Documents

1:04-cv-00910-GMS Integrated Cliff, et al v. THCI Company LLC

U.S. District Court

District of Delaware

Notice of Electronic Filing

The following transaction was received from Lastowski, Michael entered on 6/15/2006 at 2:42 PM EDT and filed on 6/15/2006

Case Name: Integrated Cliff, et al v. THCI Company LLC

Case Number: 1:04-cv-910

Filer: Integrated Health Services of Cliff Manor Inc. et al.

Document Number: 177

Docket Text:

NOTICE OF SERVICE of Plaintiffs' First Interrogatories and Plaintiffs' First Document Request by Integrated Health Services of Cliff Manor Inc. et al..(Lastowski, Michael)

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1079733196 [Date=6/15/2006] [FileNumber=230076-0]
[c9d01241f30e6aa3fa8624825e99f95fa5911bc20131438f7771d1d8e019d51ff2fd
200e3f2a7bc248282a80765b177d4a79fb780f05c10116a1f4655e5821e7]]

1:04-cv-910 Notice will be electronically mailed to:

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1:04-cv-910 Notice will be delivered by other means to: